FILED IN THE UNITED STATES DISTRICT COURT DISTRICT OF HAWAII

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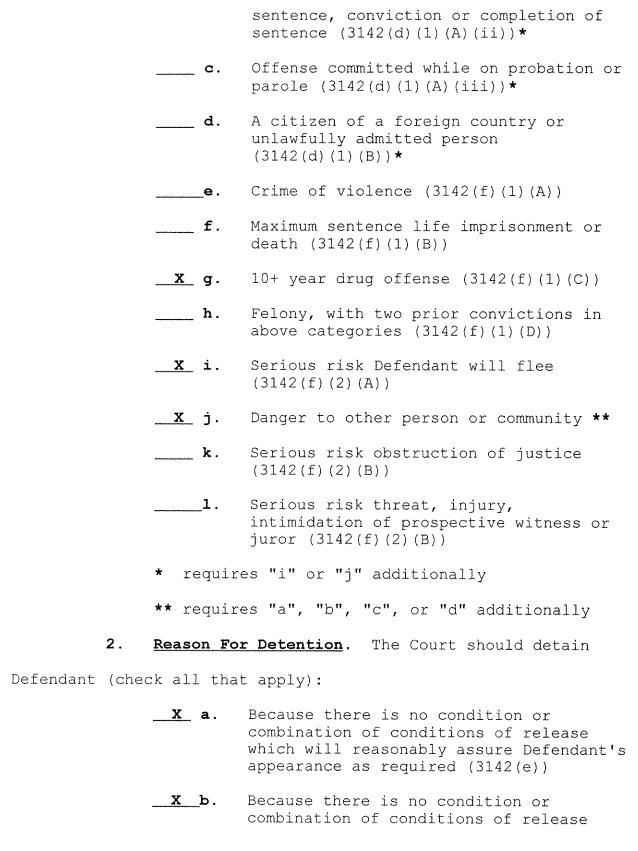
IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII UNITED STATES OF AMERICA, CR. NO! 04-0246 BMK Plaintiff, VS. MOTION TO DETAIN DEFENDANT WITHOUT BAIL KUM SUC HONG a/k/a : "Korean Connie" Defendant.

## MOTION TO DETAIN DEFENDANT WITHOUT BAIL

The United States hereby moves to detain Defendant without bail, pursuant to 18 U.S.C. Section 3142.

	1.	Eligibili	ty Of Case.	This	Defendant	is	eligible
for	detention	because the	e case invol	ves (c	check all	that	apply):
		a.	Offense com felony tria				
		b.	Offense com			_	_



	of any other person and the community (3142(e))					
c.	Pending notification of appropriate Court or official (not more than 10 working days (3142(d))					
3. <u>Rebuttable</u>	Presumption. The United States					
(will/will not) invoke t	he rebuttable presumption against					
Defendant under Section	3142(e). If invoked, the presumption					
applies because (check a	ll that apply):					
<u>X</u> a.	Probable cause to believe Defendant committed 10+ year drug offense					
b.	Probable cause to believe Defendant committed an offense under 18 U.S.C. § 924(c)					
c.	Previous conviction for eligible offense committed while on pretrial bond					
4. Time For 1	Detention Hearing. The United States					
requests that the Court conduct the Detention Hearing:						
a.	At first appearance					
<u>x</u> b.	After continuance of days (not more than 3)					
5. Rule 40 Ca	ases. The United States requests that					
the Detention Hearing be	held:					
a.	In the District of Hawaii					
b.	In the District where charges were filed					

## 6. Other Matters.

DATED: March 19, 2004, at Honolulu, Hawaii.

EDWARD H. KUBO, JR. United States Attorney District of Hawaii

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Assistant U.S. Attorney